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10 *Attorneys for Plaintiffs*

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 D.S., a minor by and through his guardian  
11 *ad litem* Elsa Acosta, individually and as  
12 successor-in-interest to William Salgado;  
13 C.S., a minor by and through his guardian  
14 *ad litem* Elsa Acosta, individually and as  
15 successor-in-interest to William Salgado;  
16 J.S., a minor by and through her guardian  
17 *ad litem* Elsa Acosta, individually and as  
18 successor-in-interest to William Salgado;  
19 M.S., a minor by and through her  
guardian *ad litem* Elsa Acosta,  
individually and as successor-in-interest  
to William Salgado,

20 Plaintiffs,

21 v.

22 CITY OF HUNTINGTON PARK; NICK  
23 NICHOLS; RENE REZA; MATTHEW  
24 RINCON; APRIL WHEELER; and  
25 DOES 5 through 10, inclusive,

26 Defendants.

Case No.: 2:23-cv-09412-CBM-AGR

*District Judge Consuelo B. Marshall  
Magistrate Judge Alicia G. Rosenberg*

**STIPULATION FOR  
CONSOLIDATION OF CASES**

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between the parties hereto that the  
3 following lawsuits be consolidated for all purposes.

4 1. The case of *D.S., et al. v. City of Huntington Park, et al.*, No. 2:23-cv-  
5 09412-CBM-AGR, was filed on November 8, 2023. The case is currently  
6 in discovery.

7 2. The case of *William Castillo-Miranda, et al. v. City of Huntington Park, et*  
8 *al.*, No. 2:24-cv-04898-CBM-AGR, was filed on June 11, 2024. A First  
9 Amended Complaint was filed on July 29, 2024. A responsive pleading  
10 thereto has not yet been filed.

11 Both cases should be consolidated and coordinated for purposes of trial. The  
12 claims in both cases arise out of the death of William Salgado, who died as a result  
13 of an incident involving officers of the City of Huntington Park Police Department  
14 on October 30, 2022, in Huntington Park, California, in the County of Los Angeles.  
15 These cases arise out of the same events and will involve the same core of operative  
16 facts. The cases differ only in that they involve different plaintiffs, based on these  
17 individuals' differing relationships with/to the decedent William Salgado, and in  
18 that the plaintiffs in the *Castillo-Miranda* matter have asserted claims against two  
19 additional officers not named as defendants in the *D.S.* matter. Accordingly, the  
20 Parties believe good cause exists to consolidate the cases.

21 **IT IS FURTHER STIPULATED** that the Defendants in the *Castillo-*  
22 *Miranda* matter shall, upon entry of any order granting or denying the Parties'  
23 request for consolidation of the two related matters, have fourteen (14) days in  
24 which to file a responsive pleading to the *Castillo-Miranda* Plaintiffs' First  
25 Amended Complaint.

26 / / /

27 / / /

28 / / /

1 IT IS SO STIPULATED.  
2

3 DATED: August 30, 2024

**LAW OFFICES OF DALE K. GALIPO**

4 By: /s/ Dale K. Galipo  
5

Dale K. Galipo<sup>1</sup>  
6 Benjamin S. Levine  
7 Attorneys for Plaintiffs  
8 D.S., C.S., J.S., and M.S.

9 DATED: August 30, 2024

**CARRAZCO LAW, A.P.C.**

10 By: /s/ Kent M. Henderson  
11

Angel Carrazco, Jr.  
12 Kent M. Henderson  
13 Christopher L. Holm  
14 Attorneys for Plaintiffs  
15 William Omar Castillo Miranda, Juana  
16 Maria Miranda, Omar Antonio Castillo  
17 Blandon, Eugenia Guadelupe Espinoza  
18 Salmeron, and Karla Vanessa Blandon

19 DATED: August 29, 2024

**ALVAREZ-GLASMAN & COLVIN  
ARNOLD M. ALVAREZ-GLASMAN  
CITY ATTORNEY**

20 By:   
21

Roger A. Colvin  
22 Christy M. Garcia  
23 Attorneys for Defendants

24  
25 \_\_\_\_\_  
26 <sup>1</sup> Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other  
27 signatories listed, and on whose behalf the filing is submitted, concur in the filing's  
28 content and have authorized the filing.